

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE:

TROY JORDON

Case No. 20-14596-amc
Chapter 13

Wintrust Mortgage, a division of Barrington Bank
& Trust Company, N.A.,
Movant

vs.

TROY JORDON,
Debtor

**OBJECTION TO CONFIRMATION
OF DEBTOR'S CHAPTER 13 PLAN**

Wintrust Mortgage, a division of Barrington Bank & Trust Company, N.A. ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtor's Chapter 13 Plan* (Doc 55), and states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on November 30, 2020.
2. Movant holds a security interest in the Debtor's real property located at 7 West Essex Avenue, Lansdowne, PA 19050 (the "Property"), by virtue of a Mortgage which is recorded in Official Records of Delaware County, Pennsylvania. Said Mortgage secures a Note in the amount of \$189,255.00.
3. The Debtor filed a Chapter 13 Plan (the "Plan") on April 4, 2022 (Doc 55).
4. Movant filed a Proof of Claim in this case on February 4, 2021 (Claim No. 13-1) which lists a secured claim of \$189,863.50 and prepetition arrears of \$4,956.44.

5. Movant objects to the Debtor's proposed Chapter 13 Plan as Part 4(b) does not list any amounts to be paid to Movant.

6. Movant objects to Debtor's proposed Chapter 13 Plan as it is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed. Movant objects to any plan which proposes to pay it anything less than \$4,956.44 as the pre-petition arrearage over the life of the plan.

WHEREFORE, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439

Matt Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

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Wintrust Mortgage, a division of Barrington Bank & Trust Company, N.A., Movant	
vs.	
TROY JORDON , Debtor	

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Objection To Confirmation Of Debtor's Chapter 13 Plan has been electronically served or mailed, postage prepaid on this day to the following:

TROY JORDON
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LANSDOWNE, PA 19050

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Chapter 13 Trustee
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November 29, 2022

/s/Andrew Spivack

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